



United States Department of Agriculture

JUL 02 2018

Food and
Nutrition
Service

Park Office
Center

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Center Drive
Alexandria
VA 22302

Iwona Ramian
SNAP Administrator
Rhode Island Department of Human Services
57 Howard Avenue, Louis Pasteur Building
Cranston, Rhode Island 02920

RE: SNAP – Rhode Island Request to Waive Able-Bodied Adults
without Dependents Time Limit – Approval

Dear Ms. Ramian:

This is in response to the Rhode Island State agency's request to waive the Supplemental Nutrition Assistance Program (SNAP) time limit for able-bodied adults without dependents (ABAWDs) in 26 areas from September 1, 2018, through August 31, 2019.

The State agency's request meets the requirements for approval provided at 7 CFR 273.24(f) and relevant Food and Nutrition Service (FNS) guidance. Therefore, FNS is approving Rhode Island to waive the time limit in the 26 areas for the requested 12-month period. The approval amends and extends waiver number 2150035. The attached waiver response includes the approved areas, the supporting evidence used, and the conditions of approval. If you have any questions please contact Maria Volpe at Maria.Volpe@fns.usda.gov.

FNS is reviewing its policies regarding ABAWD time limit waivers. Moving forward, FNS will be taking actions to support the Administration's priority to provide able-bodied Americans a path to self-sufficiency. This goal requires that we establish a clear and mutual commitment to moving SNAP participants to meaningful employment.

Sincerely,

Sasha Gersten-Paal
Chief
Certification Policy Branch
Program Development Division

Enclosure

WAIVER RESPONSE

1. **Waiver serial number:** 2150035
2. **Type of request:** Amendment and extension
3. **Statutory citation:** Section 6(o) of the Food and Nutrition Act of 2008, as amended
4. **Regulatory citation:** 7 CFR 273.24
5. **State:** Rhode Island
6. **Region:** Northeast
7. **Requirement:** Section 6(o) of the Food and Nutrition Act of 2008, as amended, provides that no able-bodied adult without dependents (ABAWD) shall be eligible to participate in the Supplemental Nutrition Assistance Program (SNAP) as a member of any household if the individual received program benefits for more than 3 months during any 3 year period in which the individual was subject to but did not comply with the ABAWD work requirement. Section 6(o) also provides that, upon the request of the State agency, the Secretary may waive the applicability of the 3-month ABAWD time limit for any group of individuals in the State if the Secretary makes a determination that the area in which the individuals reside has an unemployment rate of over 10 percent, or does not have a sufficient number of jobs to provide employment for the individuals.
8. **Proposed alternative procedures:** The Rhode Island State agency is requesting to waive the ABAWD time limit in 26 areas from September 1, 2018 through August 31, 2019. The State agency has combined certain jurisdictions for consideration as combined areas based on the towns and cities sharing the same labor market areas, while considering other jurisdictions individually. The State agency has supported its request based upon the areas having average unemployment rates 20 percent above the national average for the 24-month period of February 2015 through January 2017. During this time period the national average unemployment rate was 5.0 percent; 20 percent above that rate is 6.0 percent. As detailed in the following tables, the unemployment rate for each individual or combined area was at least 6.0 percent during the selected time period.

The State agency has grouped 23 towns and cities in the same New England City and Town Area (NECTA), as defined by the Bureau of Labor Statistics, for consideration as a combined area and has supported its request based upon the combined area having an aggregate average unemployment rate 20 percent above the national average for a recent 24-month period.

Bureau of Labor Statistics Local Area Unemployment Data February 2015 – January 2017*		
Providence-Warwick, RI-MA NECTA, RI part	Unemployment	Labor Force
1. Bristol town	14,746	290,398
2. Burrillville town	11,793	213,923
3. Central Falls city	14,420	205,096
4. Charlestown town	5,873	97,808
5. Coventry town	23,795	449,582
6. Cranston city	54,399	988,643
7. East Greenwich town	8,036	163,901
8. East Providence city	34,519	581,466
9. Foster town	3,514	69,280
10. Johnston town	21,986	375,041
11. Middletown town	9,381	190,261
12. North Providence town	24,204	430,753
13. Pawtucket city	55,197	869,308
14. Portsmouth town	10,689	211,197
15. Providence city	139,637	2,070,714
16. Scituate town	7,751	147,447
17. Smithfield town	13,576	271,242
18. South Kingstown town	20,047	396,591
19. Tiverton town	11,050	209,055
20. Warren town	7,583	136,651
21. West Greenwich town	3,883	76,367
22. West Warwick town	22,605	385,992
23. Woonsocket city	34,060	457,954
Total	552,744	9,288,670
Combined Area Unemployment Rate	6.0%	

*Data extracted from Bureau of Labor Statistics Local Area Unemployment survey (<http://www.bls.gov>) on April 19, 2018.

The State agency has grouped 2 contiguous towns in the same NECTA, as defined by the Bureau of Labor Statistics, for consideration as a combined area and has supported its request based upon the combined area having an aggregate average unemployment rate 20 percent above the national average for a recent 24-month period. As detailed in the following table, the unemployment rate for the combined area was at least 6.0 percent during the selected time period.

Bureau of Labor Statistics Local Area Unemployment Data February 2015 – January 2017*		
Norwich-New London-Westerly, CT-RI NECTA	Unemployment	Labor Force
1. Hopkinton town	6,078	112,922
2. Westerly town	18,370	272,064
Total	24,448	384,986
Combined Area Unemployment Rate	6.4%	

*Data extracted from Bureau of Labor Statistics Local Area Unemployment survey (<http://www.bls.gov>) on April 19, 2018.

The State agency has supported its request for one individual town based upon the individual area having an average unemployment rate 20 percent above the national average for a recent 24-month period. As detailed in the following table, the unemployment rate for the individual area was at least 6.0 percent during the selected time period.

Bureau of Labor Statistics Local Area Unemployment Data February 2015 – January 2017*		
Individual Town	Unemployment	Labor Force
1. New Shoreham town	2,283	19,488
Unemployment Rate	11.7%	

*Data extracted from Bureau of Labor Statistics Local Area Unemployment survey (<http://www.bls.gov>) on April 19, 2018.

9. **Action and reason for approval or denial:** The Food and Nutrition Service (FNS) is approving the Rhode Island State agency's request to waive the ABAWD time limit in the 26 areas because the jurisdictions meet the requirements for approval provided at 7 CFR 273.24(f) and relevant FNS guidance.
10. **Regulatory or legislative basis for action:** The waiver is approved pursuant to section 6(o) of the Food and Nutrition Act of 2008, as amended and 7 CFR 273.24(f).
11. **Information required for an extension:** To receive an amendment or extension the State agency must provide FNS with a formal request supported by data or other information as described in 7 CFR 273.24(f). Any request based upon unemployment rates must include data spreadsheets and supporting documentation.

- 12. Implementation date and expiration date:** The waiver is effective September 1, 2018, through August 31, 2019.
- 13. Limitation if any on regional office approval of like requests:** The waiver is limited to the Rhode Island State agency.
- 14. Date of National Office action:** JUL 02 2018
- 15. Date of State agency's request:** March 20, 2018
- 16. Date of regional office transmittal of request:** March 20, 2018
- 17. State agency contact:**
Kimberly Nikolaidis
(401) 415-8230
Kimberly.Nikolaidis@dhs.ri.gov
- 18. FNS Regional Contact:**
Maria Volpe
(617) 565-6390
Maria.Volpe@fns.usda.gov

RI FFY 2018 Able Bodied Adults Without Dependents (ABAWD) Corrective Action Response

As stipulated in 7 CFR 275.3 and 275.16, RI is required to provide a written response identifying its corrective actions outlined in this ME report. The Corrective Action Response (CAR) is due within **60 calendar days** of the date of this ME report. Please complete each element of the CAR tool detailed below.

Finding Naming Convention

FNS will assign each finding a unique identifier following the naming convention below in the ME report.

- The type of review: LPAR, SPAR, MESYS, ABAWD, ET, SNAPED, INTEG, QC, CAPER, EBT, QCSTATS, CLAIMS, TOP
- The last two digits of the FFY the review took place in where the finding was identified: e.g. if a finding resulted from a review in FFY 2018, (18) would be the first two digits in the finding name.
- Finally, a number (1, 2, 3, 4) assigned by FNS that would stay with the finding until it's closed.

For instance, if a State has a combined LPAR/ABAWD review in FFY 2019, the name for the findings would be LPAR 19.1, LPAR 19.2 and so on for the LPAR and ABAWD 19.1 and so on for the ABAWD review.

Finding Language:

FNS will provide the language for each finding in the CAR tool that corresponds with the Finding name provided.

Finding Evaluation:

The State is to conduct its own evaluation of the finding to include a review of the regulations and guidance pertaining to the finding. The State should evaluate the magnitude of the deficiency. Is it a systemic issue affecting a large portion of the case load or a minimal effect on a small portion of cases? Please comment on the geographic nature of the finding as well (Statewide concern vs. localized).

Root Cause Analysis:

The State should conduct a root cause analysis of the finding. The State should consult the background section of FNS's report on that specific finding, but not solely rely on it. The FNS review team is only onsite for a limited time, and cannot be expected to identify completely the root cause of an issue. The State should number the root causes, because in many cases, there will be more than one root cause. The cause(s) could potentially include eligibility systems issues, training of eligibility staff, notice language, policy interpretation, etc.

CA Steps & Timeline:

The State would then complete the Corrective Action steps for each root cause. Please use the same numbers for each root cause in the section as well; e.g. root cause #1 is addressed by CA step #1. Each numbered step should thoroughly address each root cause. The State should anticipate steps that might not be documented or assessed. For instance, if the root cause to the finding is strictly systems related,

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the State should consider if a systems change were to take place, would that result in a need to conduct training for eligibility staff to ensure the State operates within compliance. If a root cause requires more than one Corrective Action step, the State should name those Corrective Action steps 1A, 1B, and so on. For instance, the root cause may be a systems issues, the CA steps could be #1A- fix systems issues, #1B- provide appropriate training to eligibility staff.

Date of Completion

The State would provide the exact or expected date of completion for each Corrective Action step. Please use the same numbers for each root cause and Corrective Action step. The State should provide at a minimum, the month and year, the Corrective Action step is expected to be completed.

Monitor & Point of Contact:

For each Corrective Action step and root cause, the State should detail who is in charge of monitoring the step and what activities will take place to ensure implementation of the Corrective Action.

Documentation:

The State should detail the documentation required to validate the Corrective Action for each finding, if applicable. The documentation itself could be attached to the response, or provided later, but the detail of the document can be included in the table. For instance, if an eligibility system change is required, FNS would want to review the systems change request which could be attached to the response. In the tool, the State would briefly detail what documentation is being provided (or anticipated) and what root cause/Corrective Action step it addresses. To further stress here, FNS is not expecting actual supporting documents to be included in the tool, but merely a description of each attachment. For example, if a JIRA ticket #4 is meant to address a needed systems change related to tracking ABAWDs in a State's eligibility system, the actual JIRA ticket could be attached to the response, but in the CAR tool, a bullet could be added stating *JIRA #4 addresses needed systems change related to tracking ABAWDs*.

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Finding Name:	ABAWD 18.1
Finding Language:	The State's tracking system does not effectively track for three ABAWD countable months in a 36-month period.
Finding Evaluation:	<p>The system was counting the ABAWD months and over-writing the previous month's value with the current month. When the previous month was displayed for review, it incorrectly displayed the current month's count and not the count for the month displayed.</p> <p>The State was not acting timely on information provided by the client. Additional staff training regarding ABAWDs is required.</p>
Root Cause Analysis:	<ol style="list-style-type: none"> 1. The system was displaying a cumulative amount of all the ABAWD countable months whenever a one-month period was displayed. A system change is required to display each month individually and not in a cumulative fashion. 2. When an exemption was applied to the ABAWD case, the ABAWD clock began to count backwards. 3. The ABAWD exclusions were not being updated if there was no change in benefit issuance. 4. Due to the increased staff focus on working through the backlog of applications and recertifications, reported changes were at times overlooked. As a result, reported changes were not acted on in a timely manner. 5. In 2017, prior to the town Richmond losing its exempt status, field staff received ABAWD training and information materials during a Quarterly Staff Meeting. However, since there are a small number of ABAWD cases located in a particular catchment area, many field staff do not regularly apply what was learned in the ABAWD training. Therefore, refresher training is required.
CA steps & timeline:	<ol style="list-style-type: none"> 1. JIRA RIB-55157 was created in November 2017 to address the issue relating to the inaccurate time clock display/calculation. <ol style="list-style-type: none"> 1a. System integration testing, and acceptance testing was completed in March 2018. Fix was deployed in March 2018. 2. RIB-60828 was created to address the issue regarding the ABAWD exemption information not being updated when an individual moves from a waived area to a non-waived area. <ol style="list-style-type: none"> 2a. System integration and user acceptance testing completed in March 2018. Fix was deployed in March 2018. 3. As the backlog of applications and recertifications continues to be reduced, more staff hours will be focused on processing changes that have been reported, including those that impact an individual's ABAWD status. 3. Staff received an ABAWD overview during an all-staff Quarterly Meeting in May 2018. Staff training focused on ABAWDs is scheduled for July 2018.
Expected Date of Completion	<ol style="list-style-type: none"> 1. JIRA RIB-55157 was completed and deployed into production in March 2018. 2. RIB-60828 was completed and deployed into production in March 2018.

RI FFY 2018 Able Bodied Adults Without Dependents (ABAWD) Corrective Action Response

	<ol style="list-style-type: none"> The staff have increased their focus on reported changes. By the beginning of Fall 2018, action on reported changes are expected to be improve significantly. An all-staff ABAWD review was completed during the May 2018 Quarterly Meeting. Staff training is scheduled for July 2018 in advance of the state gaining an additional 12 cities and towns without an exemption waiver.
Monitor & Point of Contact	Kim Nikolaidis, SNAP Assistant Administrator Maureen Donnelly, Associate Director of Operations Zulma Garcia, Interdepartmental Project Manager, Staff Development
Documentation	<ol style="list-style-type: none"> Artifact #1 RIB- 55157 Artifact #2 RIB-60828 Artifact #3 ABAWD Quarterly Presentation/Slide Deck

Finding Name:	ABAWD 18.2
Finding Language:	The State is not properly screening people against exemptions to the ABAWD time limit.
Finding Evaluation:	<ol style="list-style-type: none"> The RIBridges system was not programmed with a hierarchy of exemption categories which led to the system not utilizing the most permanent ABAWD exemption reasons. Staff were not properly screening for ABAWD-related exemptions, were not accurately advising clients of their ABAWD status and/or means to remedy their situation as appropriate. Some staff were incorrectly using homelessness as a reason for ABAWD exemptions.
Root Cause Analysis:	<ol style="list-style-type: none"> RIBridges system programming did not adequately address a hierarchy of exemptions for ABAWDs. Staff needed additional training regarding the criteria for ABAWDs and how to communicate the ABAWD rules to clients.
CA steps & timeline:	<ol style="list-style-type: none"> JIRA Ticket RIB-46134 was filed and coding was developed to consider a hierarchy of potential ABAWD exemption reasons. <ol style="list-style-type: none"> System Integration Testing and User Acceptance Testing completed in January 2018. System fix deployed in February 2018 ABAWD exemptions were reviewed during a May 2018 Quarterly Staff Meeting. During that review, clarification was provided that homelessness itself is not a qualifier for an ABAWD exemption. However, staff were encouraged to explore with the client the situation that led to his/her homelessness, which may be a qualifier for an ABAWD time limit exemption. <ol style="list-style-type: none"> Guidelines and scripts will be developed and distributed to staff prior to the expansion of the number of non-waived cities and towns in September 2018. Additionally, Staff training is currently scheduled for July 2018. Training will include policy, procedures, handouts, cheat sheets and scripts.
Expected Date of Completion	<ol style="list-style-type: none"> On 2/24/18, the code fix (RIB-46134) for the system to evaluate a hierarchy of ABAWD exemptions was deployed. The all staff Quarterly meeting was held in May 2018 over various dates. The ABAWD related training for all field eligibility staff is scheduled for July 2018.

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	2.1 The procedures, handouts, cheat sheets and scripts for clients are being developed and propagated. They will be released prior to the scheduled July 2018 training.
Monitor & Point of Contact	Kim Nikolaidis, SNAP Assistant Administrator Maureen Donnelly, Associate Director of Operations Zulma Garcia, Interdepartmental Project Manager, Training unit Maria Cimini, RI DHS Policy Administrator
Documentation	1. Artifact #4 RIB- 46134 2. Artifact #3 Quarterly Presentation- ABAWD Slide Deck 3. Artifact #16 Draft ABAWD Script

Finding Name:	ABAWD 18.3	
Finding Language:	The State is not consistently informing ABAWDs of program rights and responsibilities.	
Finding Evaluation:	Many eligibility staff were not fluent in the ABAWD policies and procedures. The state had not fully developed notices or other system communications for clients prior to the reinstatement of a non-waived ABAWD community in RI.	
Root Cause Analysis:	<ol style="list-style-type: none"> 1. ABAWD training was conducted for all ETs prior to the community of Richmond, RI losing its waiver status in September 2017. However, many staff were unfamiliar with the ABAWD rules, due, in part, to the limited exposure to non-exempt ABAWD individuals. Since a statewide waiver was in place since 2009, and the majority of non-exempt ABAWDs are served by a single field office, many staff require more fluency with the ABAWD policies and procedures. Formal prompts and scripts are needed for field staff as to use as they encounter ABAWD individuals. 2. The programming of the Bridges system did not adequately address communications and notices to the ABAWD individuals. 	
CA steps & timeline:	<ol style="list-style-type: none"> 1. In May 2018, an overview of ABAWD policies were reviewed with all staff. Staff were reminded that homelessness itself is not a qualifier for an ABAWD waiver. 2. Guidelines and scripts for staff will be developed prior to the expansion non-exempt cities and towns in September 2018. 3. Staff training is currently scheduled for July 2018. Training will include policy, procedures, handouts, cheat sheets and scripts. 4. JIRA ticket RIB-67208 tracks the requirement for ABAWD stand-alone notices in the system and has a scheduled release date of August 2018. All ABAWD notices were updated to be consistent in content and include federal requirements. -JIRA ticket RIB-45494 tracks edits required to the Benefit Decision Notice to insert ABAWD language and is scheduled release date of August. -JIRA ticket RIB-67522 tracks edits required to the Interim Report Form to inform ABAWDs that they must report if their work hours fall below 20 hours/week or 80 hours/month. This change has a scheduled release date of August 2018. 	

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Expected Date of Completion	<ol style="list-style-type: none"> 1. ABAWD review completed in May 2018. Training is scheduled for July 2018. Training will include policy, procedures, handouts, cheat sheets and scripts. 2. Notice requirements are expected to be completed in August 2018. 3. All SNAP recipients living in the 12 cities and towns losing their waiver will be sent a general notification in July alerting them to the loss of waiver, providing generic information about ABAWD time limits, and referring them to a new page on the DHS website that will provide additional information. 4. In August, all SNAP recipients living in the 12 cities and towns losing their waiver will be sent a personalized notice reminding them of the loss of the waiver for their community and informing them if they are or are not ABAWDs, and if they are an ABAWD, whether or not they are exempt from the time limit.
Monitor & Point of Contact	<p>Zulma Garcia, Interdepartmental Project Manager, Training unit Maureen Donnelly, Associate Director of Field Operations Kim Nikolaidis, SNAP Assistant Administrator</p>
Documentation	<ol style="list-style-type: none"> 1. Artifact #3 Quarterly Presentation- ABAWD Slide Deck 2. Artifact #'s 5, 7 and 8 include the JIRA tickets related to the notice changes and Artifact #8 is the functional design document related to ABAWD stand-alone notices. 3. Artifact #16 Draft ABAWD Script

Finding Name:	ABAWD 18.4	
Finding Language:	15% exemptions are not accurately reported in the FNS-583 quarterly reports.	
Finding Evaluation:	The RIBridges system was not correctly programmed to accept and track the cases or individuals that were given the ABAWD 15% exemption.	
Root Cause Analysis:	<ol style="list-style-type: none"> 1. Since the ABAWD affected community of Richmond is very small and the affected number of clients within that community is also very small, the Department chose to use the 15% exemption waiver for all the affected clients for the entire 1st year. The RIBridges system did not have the required programming to be able to implement and track the 15% exemptions. 2. The ability to grant the 15% waiver is limited to the SNAP administrative staff. The Assistant Administrator has been inputting the individuals granted the 15% into the RIBridges system and manually tracking the information. However, the system requires an eligibility run to apply the 15% exemption and capture this information in a report. SNAP Administrative staff are not authorized to run or approve eligibility for a SNAP case. 	
CA steps & timeline:	<ol style="list-style-type: none"> 1. JIRA tickets RIB-52962 and RIB-74857 (AB-001) document the requirements to generate required reports of ABAWD individuals with time limited benefits, the number of countable months, ABAWD status, ABAWD exemptions, etc. These reports will provide the SNAP Administrative staff with an accurate account of the individuals with 	

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	<p>countable ABAWD months. These reports will be reviewed to determine which individuals shall receive the 15% exemption. This will be tracked manually. The first report (RIB-52962) was provided on 5/25/18. The system vendor and the state continue to adjust the parameters to receive the most accurate data. The second report, AB-001, is scheduled for completion in August 2018.</p> <p>2. A process has been developed to provide a list of cases to an ET to run eligibility once the 15% exemption is applied by SNAP Administrative staff.</p>
Expected Date of Completion	<p>1. RIB-52962 was released 5/2018. State and system vendor continue to define the parameters for this report.</p> <p>2. RIB-74857 is scheduled for release in August 2018</p>
Monitor & Point of Contact	Kim Nikolaidis, SNAP Assistant Administrator
Documentation	<p>1. Artifact #9 RIB-52962</p> <p>2. Artifact #10 RIB-74857</p>

Finding Name:	ABAWD 18.5	
Finding Language:	The State is not properly advising households of their reporting requirements.	
Finding Evaluation:	Many eligibility staff were not fluent in the ABAWD policies and procedures. The state had not fully developed notices or other system communications to the clients prior to the reinstatement of a non-waived ABAWD community in RI.	
Root Cause Analysis:	<p>1. ABAWD training was conducted for all ETs prior to the community of Richmond, RI losing its waiver status in September 2017. However, many staff were unfamiliar with the ABAWD rules, due, in part, to the limited exposure to non-exempt ABAWD individuals. Since a statewide waiver was in place since 2009, and the majority of now non-exempt ABAWDs are served by a single field office, many staff require more fluency with the ABAWD policies and procedures. Formal prompts and scripts are needed for field staff to have easy access to ABAWD information.</p> <p>2. RIBridges system programming did not adequately address communications and notices to ABAWD individuals.</p>	
CA steps & timeline:	<p>1. In May 2018, ABAWD policies and procedures were reviewed with all staff. Guidelines and scripts for staff will be developed prior to the expansion non-exempt cities and towns in September 2018.</p> <p>2. Staff training is currently scheduled for July 2018. Training will include policy, procedures, handouts, cheat sheets and scripts.</p> <p>3. JIRA ticket RIB-67208 tracks the requirement for ABAWD stand-alone notices in the system and has a scheduled release date of August 2018. All ABAWD notices were updated to be consistent in content and include federal requirements.</p> <p>4. JIRA ticket RIB-45494 tracks edits required to the Benefit Decision Notice to insert ABAWD language and is scheduled release date of August 2018.</p> <p>5. JIRA ticket RIB-67522 tracks edits required to the Interim Report Form to inform ABAWDs that they must report if their work hours fall below 20</p>	

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	hours/week or 80 hours/month. This change has a scheduled release date of August 2018.
Expected Date of Completion	<ol style="list-style-type: none"> 1. ABAWD review completed in May 2018. Training is scheduled for July 2018. 2. Notice requirements are expected to be completed in August 2018.
Monitor & Point of Contact	Maria Cimini, RI DHS Policy Administrator Kim Nikolaidis, SNAP Assistant Administrator Zulma Garcia, Interdepartmental Project Manager, Staff Development Maureen Donnelly, Associate Director of Field Operations
Documentation	<ol style="list-style-type: none"> 1. Artifact #3 Quarterly Presentation- ABAWD Slide Deck 2. Artifact #'s 5, 7 and 8 include the JIRA tickets related to the notice changes and Artifact #8 is the functional design document related to ABAWD stand-alone notices. 3. Artifact #16 Draft ABAWD Script

Finding Name:	ABAWD 18.6	
Finding Language:	The State is not appropriately identifying out-of-State countable months.	
Finding Evaluation:	The State has not adequately trained or informed staff of the policy and procedures for interviewing clients regarding their past SNAP participation and ABAWD status in another State.	
Root Cause Analysis:	ABAWD training was conducted for all ETs prior to the community of Richmond, RI losing its waiver status in September 2017. However, many staff were unfamiliar with the ABAWD rules, due, in part, to the limited exposure to non-exempt ABAWD individuals. Since a statewide waiver was in place since 2009, and the majority of non-exempt ABAWDs are served by a single field office, many staff require more fluency with the ABAWD policies and procedures. Additional training, formal prompts and scripts are needed for field staff.	
CA steps & timeline:	Guidelines and scripts for staff will be developed prior to the expansion non-exempt cities and towns in September 2018. Staff training is currently scheduled for July 2018, which will include further detail regarding counting ABAWD months from other states. Training will include policy, procedures, handouts, cheat sheets and scripts.	
Expected Date of Completion	Training is scheduled for July 2018.	
Monitor & Point of Contact	Zulma Garcia, Interdepartmental Project Manager, Staff Development Maureen Donnelly, Associate Director of Field Operations	
Documentation		

Finding Name:	ABAWD 18.7	
Finding Language:	The State is inappropriately applying the time limit for a group of individuals in the State residing in a waived area.	

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Finding Evaluation:	The State has identified and has made all of the cases affected whole for their benefits. The causality has been identified and is being addressed.
Root Cause Analysis:	The system did not have a standard way of identifying the city or town address of SNAP participants. Since there was no standard way of inputting city/town location on the address screens, it was difficult to capture accurate data regarding waived and non-waived ABAWD areas. Additionally, incorrect tables in the RIBridges system were being populated with the ABAWD information for clients.
CA steps & timeline:	<ol style="list-style-type: none"> 1. JIRA ticket RIB-67768 documents the requirements for properly identifying residence addresses to provide a greater level accuracy for tracking and reporting purposes. This is currently scheduled to be deployed in August 2018. 2. JIRA RIB-50196 creates a data fix to correct wrongly populated ABAWD tables. This fix was deployed on 1/20/18. Subsequently, in February 2018, ET's were provided a list and given instructions to reinstate the cases that were incorrectly closed or individuals that were incorrectly deemed ineligible. Their ABAWD status was updated to "E" (exempt) with the exclusion reason "A-WZ" (living in a waived area) with zero countable months. All 63 cases were fixed.
Expected Date of Completion	<ol style="list-style-type: none"> 1. RIB 67768 is scheduled for release in August 2018. 2. RIB-50196 which addressed the table issue was released in January 2018. The 63 cases effected were corrected by eligibility staff in February 2018 after the fix was deployed.
Monitor & Point of Contact	Maria Cimini, RI DHS Policy Administrator Kim Nikolaidis, SNAP Assistant Administrator
Documentation	<ol style="list-style-type: none"> 1. Artifact #11 RIB-67768 2. Artifact #12 RIB-50196 3. Artifact #13 Procedural Memo for Staff Regarding City/Town Codes

Observations and Suggestions

Observation Name:	1	
Observation Language:	The review team observed that the State SNAP E&T providers are not familiar with ABAWD policy. The Local Initiatives Support Corporation (LISC) and their sub-recipients have not received adequate training on ABAWD policy as it relates to qualifying components, the work requirement and what information should be reported to DHS. The review team conducted a meeting with Crossroads RI, an E&T provider, LISC. and DHS. The review team discussed ABAWD policy and how best an E&T provider could assist ABAWDs with meeting the ABAWD work requirement and report participation to DHS.	
Suggestion:	The SA should continue to collaborate with LISC and the E&T providers prior to the expiration of the current ABAWD waiver in September 2018 and in preparation for the additional cities and towns that will become subject to the ABAWD time limit. FNS also suggests that DHS offer training specific to ABAWD policy to both LISC and other E&T providers focusing on good cause and exceptions to the time limit. FNS	

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	notes that training on ABAWD policy was delivered by FNS and SA staff to E&T providers on April 5, 2018, but encourages the SA to provide additional trainings.
State Response:	LISC will be scheduling an informational session within the next two weeks and will include E&T providers. RI DHS will present on ABAWD policies during that session.

Observation Name:	2	
Observation Language:	The review team noted that the SA has yet to develop materials to advise community partners of the implementation of the ABAWD time limit.	
Suggestion:	The SA should put a process in place to meet with and to train community partners on the ABAWD requirements. FNS also encourages the State to provide all paper applications and documents to FNS for review and comment prior to document finalization.	
State Response:	<p>The State has been drafting materials to share with community partners who serve potential ABAWD clients and can assist them with determining if they are subject to the requirements. Included with these materials are the following:</p> <p>The community partner unfit for work form (Artifact #17) is intended to offer documentation for unfitness for work when it is not specifically medically connected but would likely be "visibly obvious" if the applicant was in a field office in front of a worker. But, since many applicants never come into the field offices, we are engaging community partners to assist with making a determination based on a visibly obvious disability.</p> <p>The C1(b) (Artifact #18) is an existing DHS form where medical professionals (including substance abuse counselors) can document a client's fitness for work for SNAP (and other programs). A SNAP applicant does not need a C1(b) to get an exemption, but the form may be used.</p> <p>The Client reported exemption request (Artifact #19) is a way for clients to report to us the reason they believe they are exempt from work requirements and time limits and give guidance to the client of what documentation they will need to send us for their particular condition.</p> <p>In addition, we will be also adding a page to our website providing ABAWDs with some policy information and all these forms.</p> <p>ABAWD policy and procedures have been discussed during SNAP Advisory Committee Meetings with community partners and materials have also been shared for information and feedback. The Associate Director of Policy Analysis, Research and Development will also be presenting ABAWD policy to the housing/homeless services community on July 27, 2018 and plans to reach out to discharge planners as well.</p>	

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Observation Name:	3	
Observation Language:	The review team observed a significant lack of knowledge and understanding of the ABAWD regulations at the eligibility technician level.	
Suggestion:	The SA should improve and enhance the training curriculum currently in place related to ABAWD policy. It is imperative that eligibility staff are prepared to make correct determinations of eligibility as it pertains to households and ABAWD policy.	
State Response:	To address this observation promptly the state incorporated a review of ABAWD policy in its Quarterly Meeting in May 2018. A more thorough ABAWD training will be held for all staff the week of July 16, 2018. The July 2018 training will be more robust with additional material provided such as policy, procedures, handouts, cheat sheets and scripts.	

Observation Name:	4	
Observation Language:	The review team noted several cases where one benefit issuance was comprised of more than one month. In review of these specific cases, it was impossible to review the circumstances used to make eligibility determinations for each month. Specific to ABAWD policy, it is critical that staff be able to review the household circumstances on a month by month basis. The review noted that for each benefit issuance ABAWD status codes were present, but it was not possible to know which month(s) the exemption applied to. It appears each case has a history page that provides information on a monthly basis, but access and familiarity with that specific page varied with SA staff.	
Suggestion:	The SA staff should have access to the circumstances used for eligibility determinations for individual months.	
State Response:	The RIBridges system does have history access which is readily accessible from the case search function. The State will remind staff of their ability to access and review case history when they have a need to do so.	

Observation Name:	5	
Observation Language:	The review team noted cases where the benefit issuance for an issuance month indicated multiple profiles making it difficult to determine a specific audit trail for case actions. This was a common occurrence in many cases where a case action could be viewed by a State staff member and also by a unique profile (MUBEDBCDLY).	
Suggestion:	The SA's system should include an audit trail to include ability to account for who actually processed benefits for each month.	
State Response:	Using the history function in RIBridges will allow you to view the actions of a particular worker who made a change to a case. The MUBEDBCDLY name that is associated with a change is a systematic update of the case relating to either a change in policy or a change due to a 'fix' was deployed into production. The State will remind staff of their ability to access and review case history when they have a need to do so.	

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VI. Open Findings

Finding Name:	Finding #LPAR17.1 (formerly L.1. included in FFY2017 Combined LPAR Review) (Open)
Finding Language:	Notice of Adverse Action does not comply with Federal Regulations Citation: 7 CFR 273.13(a)(2)
Finding Evaluation:	The State recognizes the that the NOAA's were problematic and has actively sought to remedy the situation. The issues relating to "Failure to return Recertification instead of Interim Report; Failure to return Interim Report instead of Recertification; and, Failure to provide documentation instead of over income," were unexpected consequences of SNAP cases being held open past the end of their certification period without being recertified.
Root Cause Analysis:	In an effort to reduce disruption of benefits to vulnerable Rhode Islanders, during the initial phase of system stabilization, RI DHS did not close cases with recertification or interim packets pending even if they had not been worked. Without accurate recertification and/or interim report dates logged in the system, erroneous NOAA's have been generated.
CA steps & timeline:	The Department is now closing cases for which no recertification packet or interim report was returned by the household. Additionally, as of October 1, 2017, any case, for which a recertification packet has been returned by the end of the certification period but DHS is unable to complete the processing of that recertification by the end of the certification period, will not be issued benefits until the processing of that recertification is complete and the household is determined to be eligible for continued participation. Also, anytime any eligibility technician is working on a case, s/he processes all Pending documents on that case. In September 2017, the Department implemented a Notice of Adverse Action that also acts as a renewal reminder. This reminder is sent 15 days prior to the end of the certification period. This spring, the notice was updated to provide amore specific status relating to where a household is in the renewal process. For example, the notice read, "you have either not returned your packet or your renewal has not been processed". The updated notice now shows only one of those statuses instead of both. This will help our clients better understand what actions they need to take to have a benefit determination made.
Expected Date of Completion	1. Discontinuance of extending recertification and interim dates- completed 2. Summer 2018- Updated NOAA language with renewal reminder
Monitor & Point of Contact	Maria Cimini, Associate Director, Policy
Documentation	1. Artifact #14 RI's Formal Warning Response (Section 4.1) 2. Artifact #15 RI's May 2018 Semi-Annual CAP (LPAR 15.1)

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Finding Name:	LPAR 17.2 (formerly #A.3 included in FFY2017 LPAR Combined Review) (Open):
Finding Language:	Case file documentation does not support eligibility decisions and benefit-level determinations. Citation: 7 CFR 273.2(1)(6)
Finding Evaluation:	The State is aware that documentation in the case file is sometimes lacking. Staff needs to be reminded of the importance of case notes. Additionally, electronic document management has been a recent focus for improvement.
Root Cause Analysis:	<ol style="list-style-type: none"> 1. Staff need training/ongoing reminders to document actions taken on a case within the case notes in RIBridges. 2. When RIBridges was implemented in September 2016, the plan was for all DHS field offices to scan documents while the customer waited to be seen by an Eligibility Technician (ET). The ET was then supposed to work the case using the scanned documents to ensure they were all readable and all documents were in fact, scanned. Several operational challenges led to a backlog of scanned documents and/or inaccurately indexed documents.
CA steps & timeline:	<ol style="list-style-type: none"> 1. The Center for Staff Development and Learning has collaborated with Deloitte to develop and implement a "Learning Lab on the Go". This is a space created for Eligibility Technicians and their supervisors, which is set up in their field offices, where they can practice in RIBridges in a self-paced learning environment. The Learning Lab has prepared lessons that target expressed areas of focus with an emphasis of building capacity on RIBridges. One such focused area is the inclusion of curriculum relating to the importance of case notes. Staff currently have access to this learning lab and are continually encouraged to participate. Additionally, DHS Operations has communicated the requirement for case note documentation each time a case is touched, as best practice. This is incorporated in to quarterly staff meetings and SNAP documentation training. The importance of case notes will be reiterated during the July 2018 ABAWD training. 2. As detailed in the 5/15/18 Formal Warning Response, in the June/July 2017 timeframe, 2 major improvements were made to the EDM process. The first was the automation of the Undeliverable Mail by reading the "QR" code on the piece of undeliverable mail, taking a picture of the outside of the envelope, and having Deloitte automatically upload the documents into the electronic case file (ECF) for that individual. This automation eliminated the need to manually scan and index 90% of all the undeliverable mail. The second major enhancement was the introduction of smart separator sheets at Central Scanning. The smart separator sheet, when used with a document containing a "QR" Code, will allow for documents to automatically index by reading the case number contained in the "QR" Code. This will help reduce the amount of manual errors because it eliminated the need for workers to manually type in the case number. With the upcoming late summer release of new RIBridges functionality, the field offices will all be scanning their own documents as well as utilizing smart separator sheets. With the upcoming late summer 2018 release, all field offices will be scanning and indexing all their own mail. As a result,

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	<p>processed mail will no longer be sent to the Central Scanning Center. Front office improvements will enable staff to register or associate applications, scan documents and schedule appointments on day of application. Thirteen (13) new scanners were installed in June. Scanned documents are auto indexed using a cover sheet containing customer's metadata QR code and Smart Separators by document type. Each office will complete these activities on-site. Time is saved during auto indexing. Additional time is saved by completing all tasks on-site. This combines to reduce opportunity for error and allow the greatest number of days for processing.</p>
Expected Date of Completion	<ol style="list-style-type: none"> 1. Case note training and review- ongoing and during ABAWD training in July 2018 2. Electronic Document Management improvements- June – August 2018
Monitor & Point of Contact	<p>Zulma Garcia, Interdepartmental Project Manager, Staff Development Maureen Donnelly, Associate Director, Operations Scanning/Documents: George Bowen, Administrator, Scanning Center</p>
Documentation	<p>Artifact #14 May 15, 2018 Formal Warning response Artifact #15 May 2018 Semi-Annual CAP</p>

Finding Name:	LPAR 17.3 (formerly #A.8 included in FFY2017 LPAR Combined Review) (Open)
Finding Language:	Improper assignment of certification periods. Citation: 7 CFR 273.10(f)(1)
Finding Evaluation:	In an effort to reduce disruption of benefits to vulnerable Rhode Islanders, during the initial phase of system stabilization, RI DHS did not close cases with recertification or interim packets pending even if they had not been worked. Thus, recertification dates were extended beyond the maximum allowable time.
Root Cause Analysis:	In an effort to reduce disruption of benefits to vulnerable Rhode Islanders, during the initial phase of system stabilization, RI DHS did not close cases with recertification or interim packets pending even if they had not been worked. In some scenarios, the certification end date was changed to comply with federal policy and align a household's initial date of application or their last completed recertification, whichever was most recent.
CA steps & timeline:	<p>Beginning in November 2017, the Department began closing cases for which no recertification packet or interim report was returned by the household. This practice continues and any case, on which no recertification packet is recorded as being received by the agency, is closed at the end of the household's certification period. Similarly, if no interim report is received by the end of the 6th month of the certification period, the case is closed.</p> <p>Additionally, as of October 1, 2017, any case, for which a recertification packet has been returned by the end of the certification period but DHS is unable to complete the processing of that recertification by the end of the certification period, will not be issued benefits until the processing of that recertification is complete and the household is determined to be eligible for continued participation.</p> <p>RI DHS, Deloitte and Northrup Grumman worked over several months, to review the dates associated with all cases within the caseload. Nine categories of recertification/interim status were identified (e.g. recertified within the last 9 months, within the 60-day certification window, within interim report window,</p>

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	etc.) and cases were identified as either simplified or change reporters. A review of all the dates related to each case was completed. The total caseload of 91,134 cases were reviewed. Of those 54,994 cases were identified as simplified reporters, with 49% of cases having a date changed within the system, of which 5,624 cases had their certification period end date altered. Of the 36,140 cases identified as change reporters, 34% required date alignment in the system, of which 5,233 cases had their certification period end date altered. In scenarios where the certification end date was changed, it was changed to comply with federal policy and align to their initial date of application or their last completed recertification, whichever was most recent. Recipients whose certification dates were aligned in that way were sent a notice to alert them to this change. A case note was entered for every case where certification dates were changed and a stuffer explaining the change in recert date was mailed to all impacted clients.
Expected Date of Completion	Complete/ongoing- there are recurring data fixes in place to ensure that recert dates are set appropriately according to the household's reporting status.
Monitor & Point of Contact	Maureen Donnelly, Associate Director, Operations George Bowen, Administrator, Scanning Center
Documentation	Artifact #14 May 15, 2018 Formal Warning response

Finding Name:	LPAR17.4 (formerly #A. 10 included in FFY2017 LPAR Combined Review) (Open)
Finding Language:	Untimely processing of interim reports resulting in invalid closures Citation: 7 CFR 273.12(a)(5)(iii)(B)
Finding Evaluation:	Due to delays in case processing, interim reports that were received by the agency were being auto-closed without being worked.
Root Cause Analysis:	Staffing shortages, document indexing delays, focus on application and recertification backlog processing all contributed to untimely processing of interim reports.
CA steps & timeline:	<p>RI DHS is committed to processing recertifications, interim reports, and other case documents in a timely manner. Anytime any eligibility technician is working on a case, it processes all pending documents on that case.</p> <p>Additionally, RI DHS is amid bringing on contract staff to help process the backlog of pending case documents. The contract staff will help update cases with the changes reported in the interim and case change documents, while State eligibility staff will review and rerun eligibility on the cases.</p> <p>The State of Rhode Island has been operating on a paper-list interim business process for new certifications, recertification's and interim reports. While this interim business process is not ideal, the State has been able to achieve steady state processing through this method. The worker inbox will be implemented in the summer of 2018 and will provide routing functionality for all SNAP related work.</p> <p>In addition, if an interim is received by its due date the case will remain open until the interim is processed</p>
Expected Date of Completion	October 31, 2018

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Monitor & Point of Contact	Maureen Donnelly, Associate Director, Operations
Documentation	Artifact #14 May 15, 2018 Formal Warning response

Finding Name:	LPAR 17.5 (formerly #A.12 included in FFY2017 LPAR Combined Review) (Open)
Finding Language:	Failure to properly close households at the end of the certification period Citation: 7 CFR 273.14(a)
Finding Evaluation:	Beginning in November 2017, the Department began closing cases for which no recertification packet or interim report was returned by the household. This practice continues and any case, for which no recertification packet is recorded as being received by the agency, is closed at the end of the household's certification period. Similarly, if no interim report is received by the end of the 6th month of the certification period, the case is closed. Additionally, as of October 1, 2017, any case, for which a recertification packet has been returned by the end of the certification period but DHS is unable to complete the processing of that recertification by the end of the certification period, will not be issued benefits until the processing of that recertification is complete and the household is determined to be eligible for continued participation.
Root Cause Analysis:	Complete- there are recurring data fixes in place to ensure that recert dates are set appropriately according to the household's reporting status.
CA steps & timeline:	Beginning in November 2017, the Department began closing cases for which no recertification packet or interim report was returned by the household. This practice continues and any case, on which no recertification packet is recorded as being received by the agency, is closed at the end of the household's certification period. Similarly, if no interim report is received by the end of the 6th month of the certification period, the case is closed. Additionally, as of October 1, 2017, any case, for which a recertification packet has been returned by the end of the certification period but DHS is unable to complete the processing of that recertification by the end of the certification period, will not be issued benefits until the processing of that recertification is complete and the household is determined to be eligible for continued participation.
Expected Date of Completion	Complete- there are recurring data fixes in place to ensure that recert dates are set appropriately according to the household's reporting status.
Monitor & Point of Contact	Maureen Donnelly, Associate Director, Operations
Documentation	Artifact #14 May 15, 2018 Formal Warning response